Risk Management of Carbon Tetrachloride

EPA appreciates HSIA's and member companies' willingness to provide information to inform risk management. During recent discussions with HSIA and member companies, all organizations have confirmed their interest to submit information, and requested the types of information that could inform risk management. This could include flowcharts, descriptions, briefings for EPA staff, videos, or when possible, site visits. HSIA requested EPA provide written guidance on the types of information that would be most helpful to provide. Compiling and submitting this data is entirely voluntary. This type of information described below may inform EPA's work to develop effective regulatory options under TSCA 6(a) to manage the unreasonable risks identified for carbon tetrachloride.

Below are the types of information that could be helpful to risk management:

- Information related to controlling exposures, including current work practices, engineering, and administrative controls, specifically focused on inhalation exposures to ONUs and dermal exposures to workers, including:
 - o Existing SOPs for workers.
 - Types of PPE used, methods for using PPE, duration of usage and any data on exposure reduced.
 - o Existing engineering and administrative controls applicable conditions of use
 - Detailed information or flowcharts on use of engineering controls during manufacturing, processing, loading, unloading, import, repackaging and recycling conditions of use, including existing exposure reduction practices and potential opportunities for additional exposure reduction.
 - Current practices to comply with relevant OSHA standards.
 - Obtailed information on glove use, including type of gloves, how workers are using gloves (including duration/frequency of changing, etc.), and any data that show how glove use reduces dermal exposure.
 - o Any associated cost information if available.
- Information on identifying essential uses, why they may be essential, and the impacts if the chemical were not available.
- Identification of uses or exposure scenarios that have been phased out, or can be phased out, and thus are no longer needed.
- Any information on substitute chemicals that are safe and effective alternatives, or why alternatives are not available.
- Clarification or additional information on exposures to workers and ONUs identified in the final risk evaluation that present unreasonable risks, including if the conditions of use in the final risk evaluation accurately characterizes the precise use.